

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE	:	No. 2:12-md-02323-AB
PLAYERS' CONCUSSION INJURY	:	
LITIGATION	:	MDL No. 2323
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THIS DOCUMENT RELATES TO:	:	Hon. Anita B. Brody
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ALL ACTIONS	:	

DECLARATION OF ORRAN L. BROWN, SR.

I, ORRAN L. BROWN, SR., hereby declare and state as follows:

1. My name is Orran L. Brown, Sr. I am the Chairman and a founding partner of BrownGreer PLC, located at 250 Rocketts Way, Richmond, Virginia 23231. BrownGreer PLC is the Claims Administrator under the Class Action Settlement Agreement in this action.
2. I am over the age of 21. The matters set forth in this Declaration are based upon my personal knowledge and information.
3. I submit this Declaration to describe an Opt Out revocation request we have received.
4. In its April 22, 2015 Final Approval Order and Judgment, the Court directed the Claims Administrator to make public a list of Opt Outs. We posted on the official Settlement website a list of the Opt Outs that were timely and included all the elements required for a valid Opt Out under Section 14.2(a) of the Settlement Agreement (175 names at the time) and a list of the Opt Outs that were untimely and/or were missing one or more of elements mandated by Section 14.2(a) (33 names at the time).
5. Section 14.2(c) of the Settlement Agreement provides that a Class Member who opted out but wished to revoke that Opt Out could do so by submitting a written request

to do so before the April 22, 2015 Final Approval Date. After the Final Approval Date, a valid Opt Out may revoke that Opt Out only if Class Counsel and the NFL Parties agree to permit it and the Court then approves that agreement.

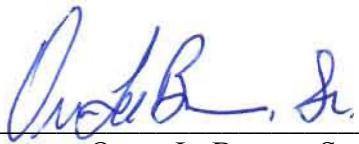
6. Since then, 88 persons who had Opted Out submitted such revocation requests. The Parties agreed to accept them, subject to Court approval, and reported the requests to the Court. The Court approved all the requests in 39 Orders entered at various times from July 15, 2015, through March 18, 2019. Each time the Court approved an Opt Out revocation, we no longer counted that person as an Opt Out and posted on the Settlement website a revised list of Timely Opt Out Requests Containing All Information Required by Section 14.2(a) or Otherwise Approved by the Court (the “Timely Opt Out List”) to reflect the results of the Order. That Timely Opt Out List now contains 93 names, including six persons whose Opt Outs the Court directed be added to it.

7. On June 5, 2019, we received by email from his lawyer a request by Mr. Dwight Hicks dated that day to revoke his Opt Out. Mr. Hicks is on the Timely Opt Out List.

8. On June 6, 2019, we presented Mr. Hicks’ request to the Parties for their consideration. The Parties have notified us that they have agreed to revocation of Mr. Hicks’ Opt Out, subject to the Court’s approval. The Parties also have agreed that, because of his Opt Out status, Mr. Hicks may register for benefits under the Settlement Agreement, if the Court approves the revocation.

9. I have attached to this Declaration a copy of Mr. Hicks’ revocation request, with his personal information redacted. If the Court approves it, Mr. Hicks will return to the Settlement Class, we will post a revised Timely Opt Out List on the Settlement website and we will notify Mr. Hicks (through his lawyer) that he may register in the Settlement.

I, Orran L. Brown, Sr., declare under penalty of perjury pursuant to 28 U.S.C. § 1746
that the foregoing is true and correct. Executed on July 10, 2019.



Orran L. Brown, Sr.

NFL CONCUSSION SETTLEMENT

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION
No. 2:12-md-02323 (E.D. Pa.)

REQUEST TO REVOKE OPT OUT FROM SETTLEMENT CLASS

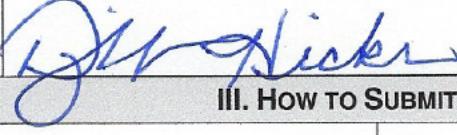
A person who Opted Out of the NFL Concussion Settlement may request to revoke that Opt Out by completing this form and sending it to the Claims Administrator. The Claims Administrator will present the request to the Parties to the Settlement Agreement for their consideration. If Class Counsel and the NFL Parties both consent, they will submit it to the Court for approval. Complete all sections of this form. If your revocation is approved, you cannot later Opt Out again.

I. PERSON SEEKING TO REVOKE OPT OUT

Name	First DWIGHT	M.I. [REDACTED]	Last HICKS
Mailing Address	Address 1 [REDACTED]		
	Address 2 [REDACTED]		
	City [REDACTED]	State [REDACTED]	Zip [REDACTED]
Telephone Number	[REDACTED]		
Date of Birth	[REDACTED] (Month/Day/Year)		

II. STATEMENT OF INTENT AND SIGNATURE

I wish to revoke my Opt Out from the Settlement Class and instead be included in the Settlement Class.

Signature		Date	<u>10/16/2015</u> (Month/Day/Year)
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III. HOW TO SUBMIT THIS FORM

By Email:	ClaimsAdministrator@NFLConcussionSettlement.com
By Mail:	NFL Concussion Settlement Claims Administrator P.O. Box 25369 Richmond, VA 23260
By Online Portal:	Go to your secure online portal with the Claims Administrator and upload this signed PDF.

www.NFLConcussionSettlement.com

ATTACHMENT